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*Attorneys for Defendant*  
**LEFRAK ORGANIZATION, INC.**

21 MC 102 (AKH)

IN RE: WORLD TRADE CENTER LOWER  
MANHATTAN DISASTER SITE LITIGATION

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SANDRA J. BAQUERO,

Case No.:  
06-CV-14486 (AKH)

Plaintiff,

-against-

BATTERY PARK CITY AUTHORITY, BFP ONE  
LIBERTY PLAZA CO., LLC, BLACKMON-  
MOORING-STEAMATIC CATASTOPHE, INC.  
D/B/A BMS CAT, BROOKFIELD FINANCIAL  
PROPERTIES, INC., EMPIRE STATE PROPERTIES,  
INC., GENERAL RE SERVICES CORP., HILLMAN  
ENVIRONMENTAL GROUP, LLC., HUDSON  
TOWERS HOUSING CO., INC., LEFRAK  
ORGANIZATION, INC., LIBERTY HOUSE  
CONDOMINIUM, LIBERTY TERRACE  
CONDOMINIUM, MILFORD MANAGEMENT  
CORP., NATIONAL ASSOCIATION OF  
SECURITIES DEALERS, INC., NEW LIBERTY  
PLAZA LP, NEW YORK CITY ECONOMIC  
DEVELOPMENT CORPORATION, NEW YORK  
CITY INDUSTRIAL DEVELOPMENT AGENCY,  
NEW YORK CITY INDUSTRIAL DEVELOPMENT  
CORPORATION, ONE LIBERTY PLAZA,  
RICHARD WINNER, THE BOARD OF MANAGERS  
OF THE ONE LIBERTY PLAZA CONDOMINIUM  
(CONDO #1178), THE ONE LIBERTY PLAZA  
CONDOMINIUM (CONDO #1178), VERIZON  
COMMUNICATIONS, INC., VERIZON NEW YORK,

**NOTICE OF ADOPTION  
OF ANSWER TO MASTER  
COMPLAINT OF LEFRAK  
ORGANIZATION, INC.**

INC., WFP ONE LIBERTY PLAZA CO., L.P., WFP  
ONE LIBERTY PLAZA CO. GP, CORP., and  
WORLD FINANCIAL PROPERTIES, L.P.,

Defendants.

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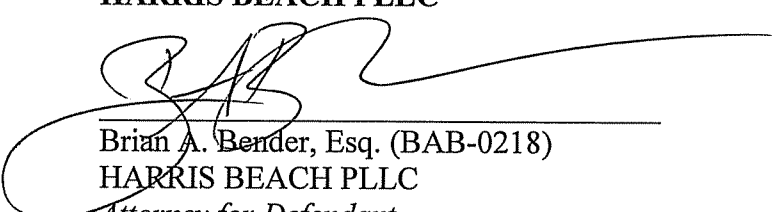
**PLEASE TAKE NOTICE THAT** defendant, LEFRAK ORGANIZATION, INC., as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts its Verified Master Answer dated July 30, 2007, which was filed in the matter of *In Re: World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). LEFRAK ORGANIZATION, INC. has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (§ J(2)).

**WHEREFORE**, LEFRAK ORGANIZATION, INC. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
September 10, 2007

Yours etc.,

**HARRIS BEACH PLLC**



Brian A. Bender, Esq. (BAB-0218)

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